

Attorney or Party Name, Address, Telephone & FAX Nos., State Bar No. & Email Address RICHARD T. BAUM State Bar No. 80889 11500 West Olympic Boulevard Suite 400 Los Angeles, California 90064 310.277.2040   fax: 310.286.9525 rickbaum@hotmail.com  <i>Attorney for:</i> Debtor HOPLITE ENTERTAINMENT, INC.	FOR COURT USE ONLY
<b>UNITED STATES BANKRUPTCY COURT CENTRAL DISTRICT OF CALIFORNIA - LOS ANGELES DIVISION</b>	
In re:  HOPLITE ENTERTAINMENT, INC.	CASE NO.: 2:21-bk-12546 ER CHAPTER: 11
	<b>STATEMENT OF DISINTERESTEDNESS FOR EMPLOYMENT OF PROFESSIONAL PERSON UNDER FRBP 2014 (File with Application for Employment)</b>
Debtor(s).	[No Hearing Required]

1. Name, address and telephone number of the professional (Professional) submitting this Statement:  
Richard T. Baum  
11500 West Olympic Boulevard, Suite 400  
Los Angeles, California 90064  
310.277.2040 | fax: 310.286.9525
2. The services to be rendered by the Professional in this case are (*specify*):  
General bankruptcy related services. Specific services set forth on attachment 1
3. The terms and source of the proposed compensation and reimbursement of the Professional are (*specify*):  
After exhaustion of the \$20,000.00 retainer (billed at \$450.00 per hour), payment will be sought by fee application made to the court and order thereon, and paid from the cash assets of the debtor.

4. The nature and terms of retainer (i.e., nonrefundable versus an advance against fees) held by the Professional are *(specify)*:  
A retainer of \$20,000 was paid, plus \$1,738.00 for the filing fee. Services are to be billed at \$450 per hour, and will be paid from the retainer following fee statement served and filed with the court. It is refundable if not wholly used.
5. The investigation of disinterestedness made by the Professional prior to submitting this Statement consisted of *(specify)*:  
Review of records of past clients, and recollections of memory. I have not had a partner or associate since 1982, so I will remember with whom I worked.
6. The following is a complete description of all of the Professional's connections with the Debtor, principals of the Debtor, insiders, the Debtor's creditors, any other party or parties in interest, and their respective attorneys and accountants, the United States trustee, or any person employed in the office of the United States trustee *(specify, attaching extra pages as necessary)*:  
Debtor's principal is Jon Smith and I had no contact with him prior to March 25, 2021. Pedro Ferre is a director of Hoplite Entertainment, though he owns no equity interest. Mr Ferre was the husband of a Chapter 13 client I represented, and for whom I obtained a \$500,000+ return following a wrongful foreclosure.
7. The Professional is not a creditor, an equity security holder or an insider of the Debtor, except as follows *(specify, attaching extra pages as necessary)*:  
Not a creditor, equity security holder or insider.
8. The Professional is not and was not, within 2 years before the date of the filing of the petition, a director, officer or employee of the Debtor.
9. The Professional does not have an interest materially adverse to the interest of the estate or of any class of creditors or equity security holders, by reason of any direct or indirect relationship to, connection with, or interest in, the Debtor, or for any other reason, except as follows *(specify, attaching extra pages as necessary)*:  
It is not considered to be adverse, but the Professional represents affiliate company Hoplite, Inc. in its Chapter 11 case, 2:21-bk-12663 ER
10. Name, address and telephone number of the person signing this Statement on behalf of the Professional and the relationship of such person to the Professional *(specify)*:  
Richard T. Baum  
11500 West Olympic Boulevard, Suite 400  
Los Angeles, California 90064  
310.277.2040 | fax: 310.286.9525

11. The Professional is not a relative or employee of the United States trustee or a bankruptcy judge, except as follows  
(specify, attaching extra pages as necessary):

None

12. Total number of attached pages of supporting documentation: 1

13. After conducting or supervising the investigation described in paragraph 5 above, I declare under penalty of perjury under the laws of the United States, that the foregoing is true and correct except that I declare that paragraphs 6 through 9 are stated on information and belief.

I declare under penalty of perjury under the laws of the United States that the foregoing is true and correct.

04/08/2021

*Date*

RICHARD T. BAUM

*Printed Name*

/s/ Richard T. Baum

*Signature*

Advising the Debtor with regard to the requirements of the Bankruptcy Court, Bankruptcy Code, Bankruptcy Rules and the Office of the United States Trustee as they pertain to the Debtor, advising the Debtor with regard to certain rights and remedies of its bankruptcy estate and the rights, claims and interests of creditors; representing the Debtor in any proceedings or hearings in the Bankruptcy Court involving its estate unless the Debtor is represented in such proceedings or hearing by other special counsel; conducting examinations of witnesses, claimants or adverse parties and representing the Debtor in any adversary proceedings except to the extent that any such adversary proceeding is in an area outside this counsel's expertise or which is beyond this counsel's staffing capabilities; preparing and assisting the Debtor in the preparation of reports, applications, pleadings and orders including, but not limited to, applications to employ professionals, interim statements and operating reports, initial filing requirements, schedules and statement of financial affairs, lease pleadings, cash collateral pleadings, financing pleadings, and pleadings with respect to Debtor's use, sale or lease of property outside of the ordinary course of business; representing the Debtor with regard to obtaining use of debtor-in-possession financing and/or cash collateral including, but not limited to, negotiating and seeking Bankruptcy Court approval of any debtor-in-possession financing and/or cash collateral pleading or stipulation and preparing any pleadings related to obtaining use of debtor in possession financing and/or cash collateral; assisting the Debtor in the negotiation, formulation, preparation and confirmation of a plan of reorganization and the preparation and approval of a disclosure statement in respect to the plan; and performing any other services which may be appropriate in the undersigned representation of the Debtor during its bankruptcy case.

## PROOF OF SERVICE OF DOCUMENT

I am over the age of 18 and not a party to this bankruptcy case or adversary proceeding. My business address is:  
11500 West Olympic Boulevard, Suite 400, Los Angeles, California 90064-1525.

A true and correct copy of the foregoing document described as STATEMENT OF DISINTERESTEDNESS will be served or was served **(a)** on the judge in chambers in the form and manner required by LBR 5005-2(d); and **(b)** in the manner indicated below:

**I. TO BE SERVED BY THE COURT VIA NOTICE OF ELECTRONIC FILING (“NEF”)** – Pursuant to controlling General Order(s) and Local Bankruptcy Rule(s) (“LBR”), the foregoing document will be served by the court via NEF and hyperlink to the document. On April 14, 2021, I checked the CM/ECF docket for this bankruptcy case or adversary proceeding and determined that the following person(s) are on the Electronic Mail Notice List to receive NEF transmission at the email address(es) indicated below:

Tanya Behnam tbehnam@polsinelli.com,  
tanyabehnam@gmail.com;ccripe@polsinelli.com;ladocketing@polsinelli.com  
Luke N Eaton eatonl@pepperlaw.com  
David M. Guess guessd@gtlaw.com  
Andrew W. Levin (TR) andy@levindrs.com, alevin@ecf.axosfs.com  
Kelly L Morrison kelly.l.morrison@usdoj.gov  
Aditi Paranjpye aparanjpye@caimcross.com, gglosser@caimcross.com  
United States Trustee (LA) ustpregion16.la.ecf@usdoj.gov  
Hatty K Yip hatty.yip@usdoj.gov, hatty.k.yip@usdoj.gov

☐ Service information continued on attached page

**II. SERVED BY U.S. MAIL:**

On April 14, 2021, I served the following person(s) and/or entity(ies) at the last known address(es) in this bankruptcy case or adversary proceeding by placing a true and correct copy thereof in a sealed envelope in the United States Mail, first class, postage prepaid, addressed as follows. Listing the judge here constitutes a declaration that mailing to the judge will be completed no later than 24 hours after the document is filed.

Judge Ernest Robles, 255 East Temple Street, Suite 1560, Los Angeles, California 90012  
Ari Newman, Greenberg Traurig PA, 333 SE 2nd Ave Ste 4400, Miami, FL 33131

☐ Service information continued on attached page

**III. SERVED BY PERSONAL DELIVERY, OVERNIGHT MAIL, FACSIMILE TRANSMISSION OR EMAIL**

(indicate method for each person or entity served): Pursuant to F.R.Civ.P. 5 and/or controlling LBR, on August 9 2019 I served the following person(s) and/or entity(ies) by personal delivery, or (for those who consented in writing to such service method), by facsimile transmission and/or email as follows. Listing the judge here constitutes a declaration that personal delivery on the judge will be completed no later than 24 hours after the document is filed.

☐ Service information continued on attached page

I declare under penalty of perjury under the laws of the United States of America that the foregoing is true and correct.

April 14, 2021  
Date

RICHARD T. BAUM  
Type Name

/s/ Richard T. Baum  
Signature